

# EXHIBIT 69

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEW JERSEY

3 - - -

4 IN RE: JOHNSON & : MDL No.  
5 JOHNSON TALCUM POWDER : 16-2738  
6 PRODUCTS MARKETING, : (MAS)(RES)  
7 SALES PRACTICES, AND :  
8 PRODUCTS LIABILITY :  
9 LITIGATION :

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10 SUPERIOR COURT OF NEW JERSEY  
11 LAW DIVISION, ATLANTIC COUNTY

12 - - -

13 IN RE: TALC-BASED : Consolidated  
14 POWDER PRODUCTS : Docket No.  
15 LITIGATION : ATL-L-2648-15  
16 :  
17 : MCL Case No.  
18 : 300

19 - - -

20 January 10, 2024

21 - - -

22 Remote Oral Expert  
23 deposition of JUDITH KAY WOLF, M.D.,  
24 conducted at the location of the witness  
in Austin, Texas, commencing at 10:15  
a.m. Eastern, on the above date, before  
Kimberly A. Cahill, a Federally Approved  
Registered Merit Reporter, Certified  
Court Reporter, and Notary Public.

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1 APPEARANCES:	1 August to December
2	2 2023
3 BEASLEY ALLEN	3 Wolf-5 Curriculum Vitae of 116
4 BY: P. LEIGH O'DELL, ESQUIRE	4 Judith K. Wolf,
5 BY: MARGARET M. THOMPSON, ESQUIRE	5 M.D.
6 218 Commerce Street	6 Wolf-6 Notice of Oral 119
7 Montgomery, Alabama 36104	7 Deposition of
8 (334) 269-2343	8 Judith E. Wolf,
9 leigh.odell@beasleyallen.com	9 M.D. and Ducs
10 margaret.thompson@beasleyallen.com	10 Tecum in MDL
11 Representing the Plaintiffs	11 Wolf-7 11/15/23 Second 124
12	12 Amended Rule 26
13 ASHCRAFT & GEREL	13 General Expert
14 BY: MICHELLE A. PARFITT, ESQUIRE	14 Report of Judith
15 1825 K Street NW	15 Wolf, M.D.
16 Suite 700	16 Wolf-8 11/15/23 Amended 125
17 Washington, D.C. 20006	17 Rule 26 Bondurant
18 (202) 335-2600	18 Case-Specific
19 Representing the Plaintiffs	19 Expert Report of
20	20 Judith Wolf, M.D.
21 GOLOMB LEGAL	21 Wolf-9 11/15/23 Amended 127
22 BY: RICHARD M. GOLOMB, ESQUIRE	22 Rule 26 Judkins
23 1835 Market Street	23 Case-Specific
24 Suite 2900	24 Expert Report of
	25 Judith Wolf, M.D.
	26 Wolf-10 11/15/23 Amended 128
	27 Rule 26 Gallardo
	28 Case-Specific
	29 Expert Report of
	30 Judith Wolf, M.D.
	31 Wolf-11 "Effects of Risk 142
	32 Factors for ovarian
	33 cancer in women
	34 with and without
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	36 Paper by Phung, et
	37 al
	38 Wolf-12 "Genital Powder Use 167
	39 and Risk of
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<p>Page 6</p> <p>1 induces malignant transformation in normal human primary ovarian epithelial cells                  Paper by Harper, et al</p> <p>2</p> <p>3</p> <p>4</p> <p>5 Wolf-18 PLOS ONE Reviewer 236                  Comments                  SAED SEPT222021-                  SUPPLE_000100                  through                  SAED SEPT222021-                  SUPPLE_000104</p> <p>6</p> <p>7</p> <p>8</p> <p>9 Wolf-19 Gynecologic Oncology Reviewer 251                  Comments                  SAED SEPT222021-                  SUPPLE_000059 and                  SAED SEPT222021-                  SUPPLE_000070</p> <p>10</p> <p>11</p> <p>12</p> <p>13 Wolf-20 General Report of Dr. Wolf Present with Witness 266</p> <p>14</p> <p>15 Wolf-21 Judkins Case-Specific Report of Dr. Wolf Present with Witness 267</p> <p>16</p> <p>17</p> <p>18 Wolf-22 Gallardo Case-Specific Report of Dr. Wolf Present with Witness 268</p> <p>19</p> <p>20</p> <p>21 Wolf-23 Bondurant Case-Specific Report of Dr. Wolf Present with Witness 268</p> <p>22</p> <p>23</p> <p>24 Wolf-24 Dr. Longo's Exposure Report Present with Witness 269</p> <p>Page 7</p>	<p>Page 8</p> <p>1 - - -</p> <p>2 DEPOSITION SUPPORT INDEX</p> <p>3 - - -</p> <p>4</p> <p>5 Direction to Witness Not to Answer                  Page Line Page Line Page Line</p> <p>6</p> <p>7</p> <p>8 Request for Production of Documents                  Page Line Page Line Page Line</p> <p>9</p> <p>10 114 6</p> <p>11</p> <p>12 Stipulations                  Page Line Page Line Page Line</p> <p>13</p> <p>14</p> <p>15 Question Marked                  Page Line Page Line Page Line</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p>Page 7</p> <p>1 Exposure Report Present with Witness</p> <p>2</p> <p>3 Wolf-25 Dr. Longo's MDL Third Supplemental Report Present with Witness 269</p> <p>4</p> <p>5</p> <p>6 Wolf-26 Dr. Levy's Report Present with Witness 269</p> <p>7</p> <p>8 Wolf-27 Entirety of Literature Dr. Wolf Brought to Deposition 270</p> <p>9</p> <p>10 Wolf-28 "HHS Public Access and risk of epithelial ovarian cancer in the Women of African Ancestry Consortium" Paper by Davis, et al 280</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>Page 9</p> <p>1 - - -</p> <p>2 THE COURT REPORTER: All parties to this deposition are appearing remotely and have agreed to the witness being sworn in remotely. Due to the nature of remote reporting, please pause briefly before speaking to ensure all parties are heard completely.</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 Counsel, please state your appearances for the record.</p> <p>11</p> <p>12 MS. O'DELL: Leigh O'Dell from Beasley Allen for the plaintiffs.</p> <p>13</p> <p>14</p> <p>15 MS. THOMPSON: Margaret Thompson from Beasley Allen.</p> <p>16</p> <p>17</p> <p>18 MS. PARFITT: Michelle Parfitt, Ashcraft &amp; Gerel, for the plaintiffs, MDL steering committee.</p> <p>19</p> <p>20</p> <p>21 MR. GOLOMB: Richard Golomb from Golomb Legal for the plaintiffs.</p> <p>22</p> <p>23</p> <p>24 MR. HEGARTY: Mark Hegarty</p>

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1 in my copy -- it's the table that says  
 2 "Association between family history and  
 3 lifestyle factors and ovarian cancer risk  
 4 by endometriosis status."  
 5 Do you see that table?  
 6 A. Yes.  
 7 Q. In that table, as to talc  
 8 and endometriosis, the authors did an  
 9 interaction test and found no  
 10 statistically significant interaction;  
 11 correct?  
 12 A. I'm looking at -- yes,  
 13 that's correct.  
 14 Q. That means that --  
 15 MS. O'DELL: Excuse me,  
 16 Mark. I don't know that she was  
 17 finished.  
 18 MR. HEGARTY: Okay. I'm  
 19 sorry.  
 20 MS. O'DELL: If you were,  
 21 Doctor, you know, fine, but I  
 22 thought you weren't finished.  
 23 THE WITNESS: But the  
 24 numbers are different. The cases

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1 and controls without endometriosis  
 2 who -- in the patients who had  
 3 genital talc use, odds ratio was  
 4 1.12 and for those with  
 5 endometriosis, it was 1.38.  
 6 BY MR. HEGARTY:  
 7 Q. So with regard to looking at  
 8 statistical significance between those  
 9 two odds ratios, statistically, there was  
 10 no difference; correct?  
 11 A. It was .2, which they did  
 12 not consider statistically significant,  
 13 but the interaction between those two was  
 14 more than any of the other risk factors.  
 15 Q. Not finding statistical  
 16 significance means that the authors could  
 17 not reject the null hypothesis of no  
 18 interaction; correct?  
 19 MS. O'DELL: Object to the  
 20 form.  
 21 THE WITNESS: Based on the  
 22 statistics they used, that's  
 23 correct.  
 24 BY MR. HEGARTY:

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1 Q. Do you mention anywhere in  
 2 your report that the Phung authors found  
 3 no statistically significant interaction  
 4 between talcum powder use and  
 5 endometriosis?  
 6 A. No. What my report states  
 7 is that it -- that paper, the OCAC group,  
 8 demonstrated a greater increased risk of  
 9 ovarian cancer with genital talc use and  
 10 endometriosis versus those without. It  
 11 doesn't say statistically significant.  
 12 Q. Why isn't the reader of your  
 13 report entitled to know that the authors  
 14 found no statistically significant  
 15 interaction between talcum powder use and  
 16 endometriosis?  
 17 MS. O'DELL: Objection to  
 18 the form.  
 19 THE WITNESS: That was not  
 20 the point of putting -- putting  
 21 this in. The point of putting it  
 22 in was, it was another group, this  
 23 well-established, respected group  
 24 of authors, who accept that talcum

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1 powder use is a risk for ovarian  
 2 cancer and that both endometriosis  
 3 and talcum powder can cause  
 4 inflammation; and that  
 5 inflammation can cause ovarian  
 6 cancer, chronic inflammation can  
 7 cause ovarian cancer.  
 8 I didn't feel that it was  
 9 important to add the statistically  
 10 significant difference or the P  
 11 value. Just it was that two  
 12 inflammatory processes increase  
 13 the risk more than one.  
 14 BY MR. HEGARTY:  
 15 Q. Please look back again at  
 16 table number 2. With regard to talc use,  
 17 it reports odds ratios below 1 for  
 18 nongenital talc use with and without  
 19 endometriosis.  
 20 Do you see that?  
 21 A. I do.  
 22 Q. Does that mean that using  
 23 nongenital talc protects or reduces the  
 24 risk against ovarian cancer in patients

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1 analysis of the risk of ovarian cancer  
 2 with genital talcum powder use in African  
 3 -- in the African-American women studied,  
 4 as it relates to all subtypes, they  
 5 cannot reject the null hypothesis of no  
 6 significant difference in risk; correct?  
 7 A. Not --  
 8 MS. O'DELL: Excuse me,  
 9 Mark. Would you mind repeating  
 10 your question?  
 11 MR. HEGARTY: Sure.  
 12 BY MR. HEGARTY:  
 13 Q. As this study relates to the  
 14 African-American women studied and for  
 15 all subtypes, they could not reject the  
 16 null hypothesis of no significant  
 17 difference in risk between talc users and  
 18 non-talc users; correct?  
 19 MS. O'DELL: Objection to  
 20 the form. Are you talking about  
 21 all participants or are you  
 22 talking about African-American  
 23 participants?  
 24 MR. HEGARTY: My question, I

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1 believe, was limited to  
 2 African-American women.  
 3 MS. O'DELL: It wasn't clear  
 4 to me. Okay. Thank you.  
 5 THE WITNESS: So in  
 6 African-American women, the odds  
 7 ratios for all-comers was 1.22.  
 8 The confidence interval did cross  
 9 1, 0.97 to 1.53.  
 10 When I'm looking at the  
 11 paper, table 2, the number of  
 12 patients, 402, had high-grade  
 13 serous cancers and then there was  
 14 22 with low grade, 51 with  
 15 endometrioid, 23 with clear cell,  
 16 40 with mucinous, and 80 with  
 17 others.  
 18 And so to look at them  
 19 individually, they can't, and when  
 20 they specifically just looked at  
 21 serous, it was statistically  
 22 significant.  
 23 BY MR. HEGARTY:  
 24 Q. When a study cannot reject

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1 the null hypothesis because the  
 2 confidence interval crosses 1, that means  
 3 the finding could be due to chance;  
 4 correct?  
 5 MS. O'DELL: Object to the  
 6 form.  
 7 THE WITNESS: So that --  
 8 that could have -- that could  
 9 happen, but this number is  
 10 consistent with all the other  
 11 numbers in many of the other  
 12 studies which are statistically  
 13 significant.  
 14 BY MR. HEGARTY:  
 15 Q. This study -- I'm sorry. Go  
 16 ahead.  
 17 A. And I -- and I would -- and  
 18 I would argue does include mucinous  
 19 tumors, which are not thought to be the  
 20 same pathologic disease as serous cancers  
 21 and endometrioid and clear cell, and so  
 22 would generally not be thought to be  
 23 related to the same risk factors.  
 24 Q. You just mentioned over in

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1 table 2 that the study looked at  
 2 histotypes of ovarian cancer in  
 3 African-American women besides high-grade  
 4 serous; correct?  
 5 A. Yes.  
 6 Q. And in particular, it lists  
 7 in table 2 that they looked at patients  
 8 with low-grade serous, endometrioid,  
 9 clear cell, mucinous, and other types of  
 10 ovarian cancer; correct?  
 11 A. Yes.  
 12 Q. And with regard to the other  
 13 histotypes that -- besides high-grade  
 14 serous, the authors -- what did the  
 15 authors find in terms of the relative  
 16 risk or odds ratio?  
 17 A. They didn't specifically  
 18 look at them individually because the  
 19 numbers are small; and as I mentioned,  
 20 for mucinous tumors, it's thought to be a  
 21 different pathway with different set of  
 22 risk factors. It's treated differently.  
 23 Q. Well, if we look over at --  
 24 well, strike that.



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1 CERTIFICATE

2

3

4

5 I, Kimberly A. Cahill, a  
 6 Federally Approved Registered Merit  
 7 Reporter, Certified Court Reporter and  
 8 Notary Public, do hereby certify that  
 9 prior to the commencement of the  
 10 examination, the witness was duly  
 11 remotely sworn by me to testify to the  
 12 truth, the whole truth and nothing but  
 13 the truth.

14 I DO FURTHER CERTIFY that  
 15 the foregoing is a verbatim transcript of  
 16 the testimony as taken stenographically  
 17 by me at the time, place and on the date  
 18 hereinbefore set forth, to the best of my  
 19 ability.

20 I DO FURTHER CERTIFY that I  
 21 am neither a relative nor employee nor  
 22 attorney nor counsel of any of the  
 23 parties to this action, and that I am  
 24 neither a relative nor employee of such  
 attorney or counsel, and that I am not  
 financially interested in the action.

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